

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

THOMAS E. PEREZ, Secretary of Labor,
United States Department of Labor

Plaintiff,

v.

DALLAS-FORT WORTH DOMICILE,
ALLIED PILOTS ASSOCIATION,

and

ALLIED PILOTS ASSOCIATION,
NATIONAL HEADQUARTERS,

Defendants.

Civil Action No. 4:14-CV-997-O

AGREED MOTION FOR ENTRY OF FINAL JUDGMENT

Pursuant to the Consent Decree and Order (Doc. 31) entered by this Court on December 17, 2015, a union officer election was conducted for the Dallas-Fort Worth Domicile of the Allied Pilots Association under the supervision of the Department of Labor. And as set forth in the Certification of Election submitted in the appendix to this motion, the Department of Labor has certified that the candidates named in the Certification of Election have been duly elected to their respective offices. (*See* App. 003-04.)

In light of the above and in accordance with the terms of the Consent Decree and Order, the parties now respectfully move the Court to enter a Final Judgment in this

action specifying that:

- (1) the persons certified by the Department of Labor as having been duly elected to their respective offices have been elected as such to serve until the next regularly scheduled election;
- (2) this action is dismissed, with prejudice; and
- (3) each party shall bear its own costs, fees (including attorney's fees), and expenses, except as otherwise agreed between the parties and with the Secretary of Labor in no event bearing any part of any other party's costs, fees (including attorney's fees), and expenses.

A proposed Final Judgment is being sent to the Court's "orders" email address.

Respectfully submitted,

JOHN R. PARKER
United States Attorney

/s/ Brian W. Stoltz
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Attorneys for Dallas-Fort Worth Domicile,
Allied Pilots Association

Certificate of Conference

This is to certify that the parties have conferred about the relief requested herein, and are in agreement and thus present this motion as an agreed motion.

/s/ Brian W. Stoltz
Brian W. Stoltz
Assistant United States Attorney

Certificate of Service

On April 29, 2016, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all parties electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Brian W. Stoltz
Brian W. Stoltz
Assistant United States Attorney